

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JULIA HEAVERN, et al. )  
                          )  
Plaintiffs,           )  
                          )  
v.                     )                   **CIVIL ACTION NO.: 05-11170-MEL**  
                          )  
CAPITAL HOTEL COMPANY )  
(COURTYARD MARRIOTT) )  
                          )  
Defendant             )

**ASSENTED TO MOTION TO EXTEND DISCOVERY DEADLINES**

Now comes the parties in this action and hereby move this Court for an order extending the time to complete the deposition discovery in this action for an additional Ninety (90) days until May 28, 2007. The parties further request that the Court amend all subsequent deadlines to correspond with the amendment of the discovery deadline. In support of their motion, the parties state as follows:

1. This is a personal injury action wherein the Plaintiffs sustained injury while swimming in Defendant's pool.
2. Plaintiff had noticed the deposition of defendant's employees, to be conducted on November 28, 2006, however have been rescheduled due to the transition in Counsel for Defendant as well as new Counsel for Plaintiff filing her Notice of Appearance this date.
3. Both parties have completed written discovery, however, depositions of employees of defendant corporation are required in order to complete the discovery process.
4. This request for an extension will afford the parties sufficient time to conclude ongoing discovery including the taking of the remaining depositions.
5. The requested enlargement of time will not prejudice any party, nor require any substantial delay in this action.
6. Counsel for all parties have jointly agreed to this motion.

7. The foregoing constitutes good cause for extension of the time within which to complete depositions until May 28, 2007.

WHEREFORE, the parties respectfully request that this Court extend the discovery deadlines for an additional Ninety (90) days until May 28, 2007 and to amend all subsequent deadlines to correspond with the amendment of the discovery deadline.

Respectfully submitted,  
The Plaintiffs,  
By Their Attorney,

s/Colleen Carroll  
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ASSENTED TO:

The Defendant,  
By Their Attorney's

s/ Michael Johnson by Colleen Carroll  
MICHAEL JOHNSON  
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Dated: 2/22/2007